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October 14, 2024

## **Via ECF**

The Honorable Orelia E. Merchant

United States District Court

Eastern District of New York

225 Cadman Plaza East

Brooklyn, New York 11201

RE: *May Flower International, Inc. v. Amoy Food Limited, et al.*  
Civil Action No.: 1:24-cv-04909-OEM-VMS

Your Honor:

This firm represents the plaintiff May Flower International, Inc. ("May Flower" or "Plaintiff") in the above-referenced case. Plaintiff commenced this action on July 15, 2024 against multiple defendants for fraud and the violation of the Racketeering Influenced and Corrupt Organizations Act ("RICO") claims. See the Complaint at Dkt. No. 1.

On September 30, 2024, defendants Amoy Food Limited, Amoy Asian Foods North America, Inc. and Wen Lin "Eric" Liu (collectively, "Amoy Defendants") filed a letter requesting a pre-motion conference for their proposed motion to dismiss the Complaint. See Dkt. No. 37.

On the same date, defendant Conexus Food Solutions LLC f/k/a Best Food Services LLC ("Conexus") filed its letter requesting a pre-motion conference for its motion to dismiss. See Dkt. No. 34.

In addition, on the same date, defendants KND Global, LLC, Allan Zhiping Chen and Wei Peng Dai (collectively, the "KND Defendants") filed their letter requesting a pre-motion conference for their proposed motion to dismiss. See Dkt. No. 35.

On October 7, 2024, defendant Grand Food Service, Inc. a/k/a Golden City Food Service ("Grand Food") filed its letter requesting a pre-motion conference for its proposed motion to dismiss. See Dkt. No. 39.

By May Flower's consent motion, the deadline to respond to all defendants' pre-motion requests has been adjourned by the Court to October 14, 2024. See the Court's Order dated October 4, 2024.

After carefully reviewing all defendants' requests for pre-motion letters, Plaintiff proposes to amend its Complaint to cure the alleged defects identified in the letters. Under Fed. R. Civ. P. 15(a)(1), a party may amend its pleading once "as a matter of course." Plaintiff is proposing to amend its Complaint by **November 4, 2024**. Plaintiff has sought consent from all appearing defendants on the proposed date for the amended complaint. Their counsel has given consent to the proposed date of November 4, 2024. Therefore, Plaintiff respectfully request the Court approve the proposed date of **November 4, 2024** for Plaintiff to file its amended complaint.

Thank you for Your Honor's consideration of this matter.

Respectfully submitted,

KEVIN KERVENG TUNG, P.C.  
*Attorneys for Plaintiff*

/s/Ge      Li  
Ge    Li

Cc: Counsel of record  
(via ECF)